

1 DAVID SEROR – Bar No. 67488  
JESSICA L. BAGDANOV – Bar No. 281020  
2 BRUTZKUS GUBNER  
21650 Oxnard Street, Suite 500  
3 Woodland Hills, CA 91367  
Telephone: (818) 827-9000  
4 Facsimile: (818) 827-9099  
Email dseror@bg.law  
5 jbagdanov@bg.law

6 Attorneys for ABC Services Group, Inc.,  
Assignee for the Benefit of Creditors of  
7 Len Co, LLC, Alleged Debtor

8 JEFFREY E. BJORK – Bar No. 197930  
AMY C. QUARTAROLO – Bar No. 222144  
9 ADAM E. MALATESTA – Bar No. 274449  
LATHAM & WATKINS LLP  
10 355 South Grand Avenue, Suite 100  
Los Angeles, California 90071-1560  
11 Telephone: (213) 485-1234  
Facsimile: (213) 891-8763  
12 Email jeff.bjork@lw.com  
amy.quartarolo@lw.com  
13 adam.malatesta@lw.com

14 Attorneys for Len Co, LLC, Alleged Debtor

15 **UNITED STATES BANKRUPTCY COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN JOSE DIVISION**

19 In re:

20 LEN CO, LLC,

21 Alleged Debtor.

Case No. 18-52484

**SUPPLEMENTAL DECLARATION OF  
LEONID PERELMAN IN SUPPORT OF  
JOINT OPPOSITION TO PETITIONING  
CREDITOR'S NOTICE OF MOTION  
AND MOTION FOR SUMMARY  
JUDGMENT AND ENTRY OF ORDER  
FOR RELIEF AGAINST LEN CO, LLC**

Date: January 23, 2019

Time: 1:00 p.m.

Place: Courtroom 3020

280 South First Street

San Jose, California 95113

1 I, Leonid Perelman, declare as follows:

2 1. I know each of the following facts to be true of my own personal knowledge,  
3 except as otherwise stated, and if called as a witness, I could and would competently testify with  
4 respect thereto. I am submitting this declaration in further support of the *Opposition to*  
5 *Petitioning Creditor's Notice of Motion and Motion for Summary Judgment and Entry of Order*  
6 *for Relief Against Len Co, LLC* (the "Opposition"). Capitalized terms used but not otherwise  
7 defined herein shall have the meanings ascribed to such terms in the Opposition.

8 2. I am the sole member of Len Co, LLC, a Delaware limited liability company  
9 ("Len Co"), and I am familiar with Len Co's bank account statements and wire transfers.

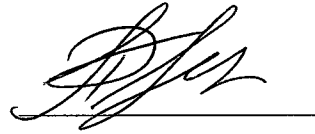
10 3. Attached as Exhibit A is a true and correct copy of Len Co's Citibank bank  
11 statement covering the period of December 1 – 31, 2017.

12 4. Attached as Exhibit B is a true and correct copy of the wire transfer  
13 confirmations associated with certain wire transfers occurring on December 29, 2017. Account  
14 number information from this document has been redacted for purposes of this filing.

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on this 21st day of January 2019 in Los Angeles, California.

A handwritten signature in black ink, appearing to read 'L. Perelman', is written over a horizontal line.

Leonid Perelman

# Exhibit A

Citibank CBO Services 942  
P.O. Box 6201  
Sioux Falls, SD 57117-6201

001/R1/04F013

000  
CITIBANK, N. A.  
**Account**  
**205799554**

**Statement Period**  
**Dec 1 - Dec 31, 2017**

LEN CO, LLC  
3031 TISCH WAY, STE 130  
SAN JOSE CA 95128

Page 1 of 1

## CitiBusiness® ACCOUNT AS OF DECEMBER 31, 2017

### Relationship Summary:

Checking	\$602,029.27
Savings	-----
Checking Plus	-----

## CHECKING ACTIVITY

### CitiBusiness Checking

205799554					Beginning Balance:	\$1,010,185.79	
					Ending Balance:	\$602,029.27	
Date	Description				Debits	Credits	Balance
12/04	ACH DEBIT				44.99		1,010,140.80
	ONLINE PAYROLL	PAYROLL	0214467	Dec 04			
12/27	CBUSOL TRANSFER DEBIT				10,000.00		1,000,140.80
	Donation on behalf of A and LPerelman						
12/28	WIRE TRANSFER					6,190,000.00	7,190,140.80
	WIRE FROM KNIGHT	CAPITAL F	UNDING	Dec 28			
12/28	ACH DEBIT				35,075.07		7,155,065.73
	PAYROLL SERVICE	5Z2X	5Z2X	5Z2X Dec 28			
12/29	CBUSOL INTERNATIONAL WIRE OUT				567,071.61		6,587,994.12
12/29	CBUSOL INTERNATIONAL WIRE OUT				5,682,672.40		905,321.72
12/29	CBUSOL TRANSFER DEBIT				19,652.64		885,669.08
	Mike Interest on Bridge Notes						
12/29	CBUSOL TRANSFER DEBIT				283,535.81		602,133.27
	Mike share of LenCo pft						
12/29	ACH DEBIT				104.00		602,029.27
	ONLINE PAYROLL	PAYROLL	4315542	Dec 29			
Total Debits/Credits					6,598,156.52	6,190,000.00	

## CUSTOMER SERVICE INFORMATION

### IF YOU HAVE QUESTIONS ON:

Checking

### YOU CAN CALL:

877-528-0990\*  
(For Speech and Hearing  
Impaired Customers Only  
TDD: 800-945-0258)

### YOU CAN WRITE:

Citibank, N.A.  
P.O. Box 790184  
St Louis, MO 63179

For change in address, call your account officer or visit your branch.

\* To ensure quality service, calls are randomly monitored.

© 2017 Citigroup Inc. Citibank, N.A. Member FDIC.

Citibank with Arc Design and CitiBusiness are registered service marks of Citigroup Inc.

# Exhibit B

Thank you for your request. Your transaction is still pending..

All transactions are subject to routine review and approval before they can be released. No further action is required from you a

Status: **Processed** - Confirmation Number is 20173620030920.

**Source Account**

Account: Len Co, #\*\*\*\*9554 (Checking)

**Scheduling**

Immediately upon approval

**Destination**

Wire initiated using model: STM HOLDINGS SARL (CLEAN CAPITAL)

Amount: \$567,071.61

Beneficiary: STM HOLDINGS SARL

Account: REDACTED

Bank: UBI BANCA INTERNATIONAL S.A.  
37A, AVENUE J.F. KENNEDY  
LUXEMBOURG Luxembourg  
SWIFT/BIC: CABILULL

Special Instructions: JP Morgan Chase Bank NA  
4 New York Plaza, NY, NY 10004  
Swift: CHASUS33XXX

**Customer Reference Number**

Customer Reference Number:

LenCoPrinc

Additional Reference:

PrincipalRepay

[Set Up Another Wire](#)

## Wire Instruction Confirmation

Thank you for your request. Your transaction is still pending..

All transactions are subject to routine review and approval before they can be released. No further action is required from yo

Status: **Processed** - Confirmation Number is 20173620016218.

### Source Account

Account: Len Co, #\*\*\*\*\*9554 (Checking)

### Scheduling

Immediately upon approval

### Destination

Wire initiated using model: STM HOLDINGS SARL (INCOME ACCOUNT)

Amount:	\$5,682,672.40
Beneficiary:	STM HOLDINGS SARL
Account:	REDACTED
Bank:	UBI BANCA INTERNATIONAL S.A. 37A, AVENUE J.F. KENNEDY LUXEMBOURG Luxembourg SWIFT/BIC: CABILULL
Special Instructions:	JP Morgan Chase Bank NA 4 New York Plaza, NY, NY 10004 Swift: CHASUS33XXX

### Customer Reference Number

Customer Reference Number:	LenColInter
Additional Reference:	InterestPmt